

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
LUFKIN DIVISION**

In re:) Chapter 11
)
TEXAS PELLETS, INC.,¹) Case No. 16-90126
)
Debtor.) (Request for Joint Administration Pending)
)

**REQUEST FOR EMERGENCY CONSIDERATION
OF CERTAIN "FIRST-DAY" MATTERS**

On April 30, 2016 (the "Petition Date"), TEXAS PELLETS, INC. ("TPI") and GERMAN PELLETS TEXAS, LLC ("GPTX") (collectively, the "Debtors") filed petitions for relief under Chapter 11 of the Bankruptcy Code in this Court. Counsel for the Debtors believe that the cases qualify as "Complex Chapter 11 Cases." The Debtors need emergency consideration of the following initial case matters (check those that apply) (the "First-Day Matters"):

- *Amended Emergency Motion for Entry of an Order Authorizing Joint Administration of Related Chapter 11 Cases* [Doc. No. 8];
- *Emergency Motion for Interim Order and Final Order (1) Authorizing Debtors in Possession to Obtain Postpetition Financing; (2) Authorizing Debtors in Possession to Use Cash Collateral; (3) Providing Adequate Protection; and (4) Granting Liens, Security Interests and Superpriority Claims* [Doc. No. 9];
- *Emergency Motion for Entry of an Order Under 11 U.S.C. §§ 105, 363, 364, 1107 and 1108 Authorizing Maintenance of Existing Bank Accounts, Continued Use of Existing Business Forms and for Related Relief* [Doc. No. 10];
- *Emergency Motion for Entry of an Order (I) Authorizing Payment of Wages and Employee Benefits; and (II) Directing Financial Institutions to Honor and Process Checks and Transfers Related to Such Obligations* [Doc. No. 11];
- *Emergency Motion for Entry of an Order (I) Authorizing the Debtors to Continue*

¹ The last four digits of the Federal Tax Identification Number of **Texas Pellets, Inc.** are 3478. The Debtor's principal place of business and service address is 164 County Road 1040, Woodville, Texas 75979.

Prepetition Insurance Coverage Policies and Practices; (II) Continuing Bond Coverage; and (III) Directing Banks to Honor All Payments Related Thereto [Doc. No. 12];

- *Initial Emergency Motion for an Extension of Time for Filing Schedules and Statements of Financial Affairs Pursuant to Fed. R. Bankr. P. 1007(c) and Local Rule 1007(b)* [Doc. No. 13];
- *Debtors' Emergency Motion for an Order Pursuant to Sections 105 and 363 of the Bankruptcy Code and Bankruptcy Rule 6004 Authorizing the Debtors to Pay Prepetition Claims of Critical Vendor Mid South Fire Solutions, LLC* [Doc. No. 14];
- *Debtors' Emergency Motion Pursuant to Sections 105(a) and 363(b) of the Bankruptcy Code for Interim and Final Orders Authorizing the Debtors to Enter Into Management Services Agreement with German Pellets GmbH* [Doc. No. 15];
- *Declaration of Bryan Davis in Support of Chapter 11 Petitions and First Day Pleadings* [Doc. No. 16]
- *Notice of Designation as a Complex Chapter 11 Bankruptcy Case* [Doc. No. 17]; and

Dated: May 2, 2016.

Respectfully submitted,

/s/ W. Steven Bryant
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-and-

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**PROPOSED COUNSEL TO THE DEBTORS
AND DEBTORS IN POSSESSION**

CERTIFICATE OF SERVICE

I hereby caused a true and correct copy of the foregoing Motion to be served upon the parties listed on the attached Combined Master Service List via U.S. Mail and ECF Notification on May 2, 2016.

/s/ W. Steven Bryant
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